

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

	)	
FEDERAL TRADE COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 04-CV-11136GAO
	)	
DIRECT MARKETING CONCEPTS, INC., et	)	
al.,	)	
	)	
Defendants.	)	
	)	

**DEFENDANTS' MOTION FOR LEAVE TO FILE  
A MEMORANDUM OF LAW IN EXCESS OF 20 PAGES**

Defendants Direct Marketing Concepts, Inc., ITV Direct, Inc., Donald W. Barrett and Robert Maihos (collectively, “DMC Defendants”) hereby move for leave of this Court to file an Opposition to Plaintiff’s Motion to Strike Affidavits Submitted by Defendants in Support of Their Opposition to Plaintiff’s Motion for Summary Judgment that is in excess of the twenty-page limit provided in Local Rule 7.1(b)(4). The Opposition contains 42 pages.

As grounds for this Motion, DMC Defendants state that the Plaintiff filed a detailed memorandum of law in support of its motion to strike that contained 41 pages, and sought to strike portions of six affidavits submitted by the DMC Defendants in opposition to the FTC's motion for summary judgment on various grounds. In order for the DMC Defendants to respond to all of the arguments raised in the Plaintiff's motion, a detailed opposition by the DMC Defendants was necessary.

WHEREFORE, DMC Defendants respectfully request that this Court allow it to file an Opposition to Plaintiff's Motion to Strike Affidavits that is in excess of twenty pages.

Respectfully submitted,  
DIRECT MARKETING CONCEPTS, INC.,  
ITV DIRECT, INC., AND DONALD W.  
BARRETT

By their attorney(s),

/s/ Christopher F. Robertson  
Peter S. Brooks, BBO #058980  
Christopher F. Robertson, BBO #642094  
Susan W. Gelwick, BBO #567115  
SEYFARTH SHAW LLP  
Two Seaport Lane, Suite 300  
Boston, MA 02210-2028  
Telephone: (617) 946-4800  
Telecopier: (617) 946-4801

Dated: March 28, 2006

Certificate of Service

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on 3/28/06.

/s/ Christopher Robertson